

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JOHN ANTHONY CASTRO (01)

CRIMINAL NO. 4:24-CR-001-Y

**GOVERNMENT WITNESS LIST**

The United States of America, by and through its counsel, respectfully files this, the Government's Witness List, in the above captioned case.<sup>1</sup>

No.	Witness	Subject Matter of Testimony
<b><i>Background Witnesses</i></b>		
1.	<b>Ted Gudorf</b> Fact Witness	Mr. Gudorf will testify about his employment of Castro, Castro's qualifications, and Castro's behavior.
<b><i>Undercover agent</i></b>		
2.	<b>Angela Johnson</b> <b>aka "Angela Jackson"</b> Fact Witness	Special Agent Jackson will testify about her interaction and communications with the defendant and will sponsor the recordings between her and Castro. She will testify about the falsities contained in the tax filing that Castro filed on behalf of Jackson. Her testimony relates to Count 1.
<b><i>Taxpayer - Victims</i></b>		
3.	<b>Linda Rivera</b> Fact Witness	Ms. Rivera will testify about her interactions and communications with the defendant and the defendant's staff, the filing of her federal income taxes through Castro & Co. and the falsities therein. Her testimony relates to Counts 6 through 8.

<sup>1</sup> The government can provide the contact information for these witnesses in communications with defense counsel and has not listed it in this public document.

4.	<b>Randolph Ragsdale</b> Fact Witness	Mr. Ragsdale will testify about his interactions and communications with the defendant and the defendant's staff, the filing of his and his wife's federal income taxes through Castro & Co. and the falsities therein. His testimony relates to Counts 12 through 14.
5.	<b>John Meyer</b> Fact Witness	Mr. Meyer will testify about his interactions and communications with the defendant and the defendant's staff, the filing of his and his wife's federal income taxes through Castro & Co. and the falsities therein. His testimony relates to Count 21.
16.	<b>Michael Putica</b> Fact Witness	Mr. Putica will testify about his interactions and communications with the defendant and the defendant's staff, the filing of his and his wife's federal income taxes through Castro & Co. and the falsities therein. His testimony relates to Count 26.
7.	<b>Michael Natt</b> Fact Witness	Mr. Natt will testify about his interactions and communications with the defendant and the defendant's staff, the filing of his and his wife's federal income taxes through Castro & Co. and the falsities therein. His testimony relates to Count 27.
8.	<b>Ahmad Lampkin</b> Fact Witness	Mr. Lampkin will testify about his interactions and communications with the defendant and the defendant's staff, the filing of his federal income taxes through Castro & Co. and the falsities therein. His testimony relates to Counts 28 through 29.
<b><i>Employees for Castro</i></b>		
9.	<b>Kasondra Humphreys</b> Fact Witness	Ms. Humphreys will testify about her employment with Castro & Co. and the way in which the office operated, taxes for clients were drafted, processed, reviewed, and filed and her communications with Castro.
10.	<b>Katie Hernandez</b> Fact Witness	Mrs. Hernandez will testify about her employment with Castro & Co. and the way in which the office operated, taxes for clients were drafted, processed, reviewed, and filed and her communications with Castro.

<b><i>Case Agent</i></b>		
11.	<b>Adam Wieborg</b> Fact Witness	Agent Wieborg is the revenue agent assigned to this matter and performed an analysis of the tax filings submitted by Castro, the positions he has taken, and will testify about IRS regulations and law.
12.	<b>Tuan Ma</b> Fact Witness	Special Agent Ma was the case agent and will testify about the investigation and evidence that he recovered, including email communications sent by Castro to the government and public statement made by Castro.
<b><i>Potential Additional Witnesses</i></b>		
13.	<b>Amy Dunford</b> Fact Witness	If called, Agent Dunford, who is an experienced revenue agent, will discuss IRS regulations and law. She will not provide opinions. The necessity of her testimony will be determined by defense arguments. In addition, she may be called as a rebuttal witness, following Castro's anticipated testimony.
14	<b>Dr. Bruce McGovern</b> Fact Witness	If called, Dr. McGovern, who is a long-time practitioner and academic, will discuss IRS regulations and law. He will not provide opinions. The necessity of his testimony will be determined by defense arguments. In addition, he may be called as a rebuttal witness, following Castro's anticipated testimony.

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<sup>2</sup> The government is not listing multiple witnesses, including victim/taxpayers, such as Paul Clayton, Christian Karavangelos, Crystal Wells, Brian Quigley, Javier Sola, Joseph Zilinski, Federico Turatti, Fabio Ramos, and Frances Fifis-Boggs, whose testimony has been stipulated to in Dkt. No. 36. Further, the government is not listing multiple evidence custodian witnesses, as the parties have stipulated to the authenticity of the Government Exhibits. (See Dkt. No. 36.)

Respectfully submitted,

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